



565 Fifth Avenue, 7th Floor
New York, New York 10017
t: 212.344.4619
f: 201.441.9435
www.hdrbb.com

December 18, 2018

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

**JOINT APPLICATION
TO EXTEND DEADLINE FOR
OBJECTIONS TO REPORT AND
RECOMMENDATION**

**Re: Sea Trade Maritime Corp., et al. v. Coutsdontis, et al.
Civil No. 09-488 (LGS) (HBP)**

Dear Judge Schofield:

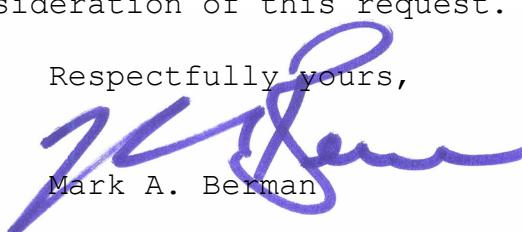
Objections to Judge Pitman's Report and Recommendation are due on December 21, 2018. Please accept this letter in lieu of a more formal joint motion requesting an extension of the deadline to file objections to January 21, 2019 and any responses to the objections to February 20, 2019. In addition to the upcoming holidays, the basis of this request is as follows:

- (1) I have two opposition briefs due this week in a matter pending in New York Supreme Court;
- (2) I have a Third Circuit brief on appeal due on December 28, 2018; and
- (3) I have a multiple-party jury trial commencing on January 8, 2019 in Atlantic City, New Jersey.

Plaintiffs' counsel joins in this request.

Thank you for your kind consideration of this request.

Respectfully yours,


Mark A. Berman

cc: All Counsel of Record (via ECF)